

JAN 1987

US EPA RECORDS CENTER REGION 5



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5ME-14

Donald J. Hewitt, Planning Director  
Planning Department  
City of Detroit  
3400 Cadillac Tower  
Detroit, Michigan 48226

Dear Mr. Hewitt:

We have reviewed the Final Environmental Impact Statement (EIS) for the Jefferson/Conner Industrial Revitalization Project, in the City of Detroit, Wayne County, Michigan. Our comments on the Draft EIS were dated December 9, 1986. The Draft EIS was given an EO-2 rating. Our concerns included identification and disposal of hazardous materials, noise, and air quality. This rating indicated that we would object to the release of Federal funds for this project if additional information was not provided.

The project area is bounded by Mack Avenue on the northwest, Clairpointe Avenue and the alley east of Conner Avenue on the northeast, Freud Avenue on the southeast, and the alley west of St. Jean Avenue on the southwest. The proposed action would require the acquisition of 742 parcels of land, relocation of approximately 2,000 residents and 100 businesses, and demolition of 640 structures, including Chrysler's existing Jefferson Avenue Assembly Plant. Chrysler would utilize the area north of Jefferson Avenue for a new 2,000,000 square foot assembly plant and ancillary facilities. The rail yard currently at the site would be expanded, requiring the relocation of Mack Avenue. In the area south of Jefferson Avenue, buildings owned by Chrysler and residential properties would be cleared for future industrial use and relocated rail access to the Detroit Edison Power Plant.

The City of Detroit has requested funding from the U.S. Department of Housing and Urban Development. Funding for street reconstruction may be provided by the Federal Highway Administration. Funding may also be provided by the Economic Development Administration of the U.S. Department of Commerce.

Our comments on the Draft EIS indicated concerns related to the lack of a clearly defined procedure for identification and disposal of hazardous materials. Revisions have been made to the sections of the EIS that address these topics. Prior to the publication of the Final EIS, we were given the opportunity to review the revisions. We commented on the revisions on December 17th, by telephone, to Ms Beth Lowery. We followed these comments with a letter to you dated December 18, 1986, indicating that the proposed changes satisfied our concerns.

The Final EIS included a commitment to future coordination with the USEPA and the Michigan Department of Natural Resources (MDNR). In addition to the areas discussed in the Final EIS, we request that we be given the opportunity to evaluate safety plans and quality control and quality assurance plans. This coordination should be discussed in the Record of Decision. We look forward to working with the City of Detroit during the development and implementation of measures to ensure that all hazardous materials are identified and properly disposed.

The air quality section in the Final EIS was a complete revision of the information in the Draft EIS. Our review of the Final EIS has resulted in concerns related to increased emissions of volatile organic compounds (VOC). We discussed the following concerns, by telephone, with representatives of the City of Detroit and the Michigan Department of Natural Resources, on January 26, 1987.

The Final EIS projected a 1,628 tons/year increase in VOC emissions. The Final EIS asserted that this increase would be consistent with the State Implementation Plan (SIP). To support of this conclusion, the Final EIS referenced a letter from Jon Trout, of MDNR. This letter was not included in the Final EIS, however.

The SIP currently under review by the USEPA demonstrates a December 31, 1987 VOC emissions attainment margin of approximately 506 tons VOC/year. The SIP does not provide for increases in emissions such as those anticipated from the Jefferson/Conner project. The SIP indicated that, in the Detroit area, MDNR will address major new source growth on a case-by-case basis. Each new source would be required to obtain offsets from existing sources. These offsets would reflect VOC emission reductions beyond reductions obtained from reasonably available control technology.

The EIS implied that Chrysler would rely on the SIP growth margin or previous source closures for offsets. The SIP has an inadequate growth margin to accomodate the new Chrysler plant. No data have been given to show that previous source closures have provided sufficient VOC emission reductions to offset VOC emissions from the Chrysler ~~facility~~ and other source growth in the Detroit area.

Additional information must be provided regarding where offsets would be located. Offsets should be located within Wayne, Macomb, and Oakland County, rather than the seven county area included in the Southeastern Michigan Council of Governments and the Michigan New Source Review Rule 220.

Chrysler's plans to meet the requirements of the Lowest Achievable Emission Rate (LAER) for VOC were discussed on page V-29. This discussion specified that Chrysler would use incinerators, coatings, and other materials "which meet LAER criteria." In general, these plans are satisfactory. The Final EIS indicated that solvent wipe emissions would be 1,800 tons/year. Based upon a preliminary analysis, this is inconsistent with LAER. A detailed LAER analysis will be made during the air quality permit process.

We would like to take this opportunity to note that, before we can concur with the issuance of the air quality permit for this project, we must be provided with a more detailed description of the VOC content of coatings and materials, along with a detailed description of incinerator control efficiencies. In addition to the use of low-VOC coatings and materials, and add-on controls, the use of high transfer efficiency application equipment will also be required.

We understand that our concerns related to adequate emission offsets and LAER will be addressed during the air quality permit process. Early coordination is strongly encouraged. The Record of Decision should note that these air quality issues are currently unresolved and require further coordination.

The impacts to ambient carbon monoxide concentrations from automobile traffic were modeled using Mobile 3, for emission factors, Caline 3, for line sources, and Point-Area-Line for parking lots. We concur with the conclusion that the proposed activities will not result in violations of carbon monoxide standards.

Rail, truck, and other traffic will result in significant noise impacts. The Draft EIS discussed possible noise mitigation. The Final EIS noted that welded rail on a standard ballast bed and curves as wide as possible will be utilized in the railyard to minimize noise production. The Final EIS contained a commitment to a twenty foot berm along the west side of St. Jean Avenue, between Jefferson Avenue and Mack Avenue, and a fourteen foot berm/wall east of Conner Avenue, between Kercheval and relocated Mack Avenue. This commitment should be reflected in the Record of Decision.

We do not object to the release of Federal funds for the Jefferson/Conner Industrial Revitalization Project. Adequate mechanisms have been developed to address the hazardous materials and air quality issues.

Thank you for the opportunity to comment on the Final EIS for the Jefferson/Conner Industrial Revitalization Project. If you have questions regarding these comments, please contact Tom Nowicki, at 312-836-4244.

Sincerely yours,

William D. Franz, Chief  
Environmental Review Branch  
Planning and Management Division

SME-14;TNowicki:Disk 2

cc: H. Furton, HUD, Detroit  
B. Elder, SME-12  
C. Hash, SAR  
W. Dickerson, EPA OEA  
J. Trout, MDNR  
Southeast Council of Governments, Detroit, MI

Ronald J. Hewitt, Planning Director  
Planning Department  
City of Detroit  
3400 Cadillac Tower  
Detroit, Michigan 48226

rec'd  
1-22-87  
comment  
due 1-26-87

Dear Mr. Hewitt:

We have reviewed the Final Environmental Impact Statement (EIS) for the Jefferson/Conner Industrial Revitalization Project, in the City of Detroit, Wayne County, Michigan. Our comments on the Draft EIS were dated December 9, 1986. The Draft EIS was given an E0-2 rating. Our concerns included identification and disposal of hazardous materials, noise, and air quality. This rating indicated that we would object to the release of Federal funds for this project if additional information was not provided.

P The project area is bounded by Mack Avenue on the northwest, Clairpointe Avenue and the alley east of Conner Avenue on the north-east, Freud Avenue on the southeast, and the alley west of St. Jean Avenue, on the southwest. The proposed action would require the acquisition of 742 parcels of land, relocation of approximately 2,000 residents and 100 businesses, and demolition of 640 structures, including Chrysler's existing Jefferson Avenue Assembly Plant. Chrysler would utilize the area north of Jefferson Avenue for a new 2,000,000 square foot assembly plant and ancillary facilities. The rail yard currently at the site would be expanded, requiring the relocation of Mack Avenue. In the area south of Jefferson Avenue, residential properties and buildings owned by Chrysler would be cleared for future industrial use and relocated rail access to the Detroit Edison Power Plant.

The City of Detroit has requested funding from the U.S. Department of Housing and Urban Development. Funding for street reconstruction may be provided by the Federal Highway Administration. The title page, of the Final EIS, indicated that the U.S. Department of Commerce, Economic Development Administration (EDA), was a cooperating agency and funding for the project may also be provided by EDA.

R The most significant environmental impact related to the implementation of this project was identification and disposal of hazardous materials. In our December 9, 1986, comments on the Draft EIS we indicated <sup>we</sup> had concerns related to the lack of clearly <sup>a</sup> defined procedure for the identification, characterization, cleanup and disposal of hazardous or toxic materials found in the project area. In response to our comments on the Draft EIS, revisions were made to the sections of the EIS that addressed these issues. Prior to the publication of the Final EIS, we were given the opportunity to review the revisions. We commented on the revisions on December 17th, by telephone, to Ms Beth Lowery. We followed these comments with a letter to you dated December 18, 1986, indicating that the proposed changes and additional measures satisfied our concerns.

R The Final EIS included a commitment to future coordination with the USEPA and the Michigan Department of Natural Resources. This coordination and how it will be implemented should be noted in the Record of Decision. We are looking forward to working with the City of Detroit during the development and implementation of measures to ensure that all hazardous materials are identified and properly disposed.

The air quality section has been completely revised in the <sup>Final</sup> EIS. The analysis revised discussed both stationary and mobile sources.

*P* The impacts to ambient carbon monoxide concentrations from automobile traffic were modeled using Mobile 3, for emission factors, Caline 3, for line sources, and PAL for parking lots. The Final EIS presented results for both "worst case" and "most likely" meteorological conditions.

*P* ✓ The Final EIS presented the results <sup>for</sup> of three scenarios. The three scenarios were described on page M-1:

Existing 1985 - existing roadway and parking lot configuration with 1985 traffic

Proposed 1985 - proposed roadway and parking lot configuration with 1985 traffic

Proposed 2005 - existing roadway and parking lot configuration with 2005 traffic

According to the information provided the "Existing 1985" is the present condition, the "Proposed 1985" is the proposed action with 1985 traffic data, and the "Proposed 2005" is actually the "no-build" case. The Final EIS failed to discuss a case with the proposed roadway and parking lot configuration with 2005 traffic. Without data for future conditions with a completed project, the results of this mobile source analysis are incomplete. →

*P* ✓ We are unable to determine ~~what~~ the air quality impacts ~~might be~~ and whether or not mitigation measures are necessary.

✓ Exhibits V-19 and V-22 show exceedences of the eight hour carbon monoxide standard for the "Proposed 1985" scenario at three receptors and exceedences at two receptors in the "Existing 1985" scenario.

Without the analysis of the build alternative with the 2005 traffic it is not possible to assess the impacts. Therefore, we ask that a provision be included in the Record of Decision that the additional  
✓ air quality evaluation be done and be provided to our Agency, the Michigan Department of Natural Resources and the Southeast Michigan  
✓ Council of Governments. Furthermore, if the analysis indicates  
✓ violations, the City of Detroit must agree that mitigative measures will be implemented to offset any violations.

R A significant increase in volatile organic chemicals is expected. The Final EIS indicated that Chrysler will implement "Lowest Achievable Emission Rate" control technology and increased VOC emissions will be balanced by existing offsets and pollution control strategies.

Rail, truck, and other traffic will result in significant noise impacts. The Draft EIS discussed possible noise mitigation. The Final EIS noted that welded rail on a standard ballast bed and curves as wide as possible will be utilized in the railyard to minimize noise production. The Final EIS contained a commitment to a twenty foot berm along the west side of St. Jean Avenue, between Jefferson Avenue and Mack Avenue, and a fourteen foot berm/wall east of Conner Avenue, between Kercheval and relocated Mack Avenue. This commitment should be reflected in the Record of Decision.

R ✓ The Final EIS addresses our concerns related hazardous and toxic wastes. We have no objections to the proposed project provided the Record of Decision includes provision for addressing coordination  
✓ and cleanup of hazardous and toxic wastes, and the need to do



✓ additional air quality analysis<sup>e</sup>s, and if necessary mitigate the air quality violations attributable to the project. The Record of Decision should also detail the noise mitigation measures to be implemented.

Thank you for the opportunity to <sup>review and</sup> comment on the Final EIS for the Jefferson/Conner Industrial Revitalization Project. If you have any questions regarding these comments, please contact Tom Nowicki, at 312-886-4244.

Sincerely yours,

William D. Franz, Chief  
Environmental Review Branch  
Planning and Management Division

5ME-14:TNowicki:1/12/86

cc: W. Furton, HUD, Detroit  
Bonnie Eleder, 5HE-12  
Carl Nash, 5AR  
Bill Dickerson, EPA OFA  
Michigan DNR, Lansing Michigan  
Southeast Council of Governments, Detroit, Mi.

Mr. Wesley Furton  
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U.S. Department of Housing and Urban Development  
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477 Michigan Avenue  
Detroit, Michigan 48226-2529

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: 30 DEC 1986

SUBJECT: Jefferson/Conner Industrial Revitalization Project

FROM: William D. Franz, Chief Bill Franz  
Environmental Review Branch

TO: Norman Niedergang, Supervising Engineer  
CERCLA Enforcement Section

Attention: Bonnie Eleder

In accordance with the National Environmental Policy Act and Section 309 of the Clean Air Act, we have been given the opportunity to review the attached Final Environmental Impact Statement (EIS) for the Jefferson/Conner Industrial Revitalization Project, in Detroit, Michigan. Because of pending Federal involvement in this project, we have a responsibility to ensure that all of the environmental impacts of this project have been addressed and any potential adverse impacts are minimized.

Please give particular attention to the discussion of identification and disposal of solid and hazardous wastes, pages IV-18 to IV-28, V-39 to V-45, and Appendix H. Please review the EIS and return your comments to me by January 22, 1987. Your comments will be included in our response to the City of Detroit and the Department of Housing and Urban Development. If you have questions, please contact Tom Nowicki, at 6-4244. Thank you.

Attachment

TOM.  
Nowicki  
6-4244